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24 UNITED STATES DISTRICT COURT  
25  
26 NORTHERN DISTRICT OF CALIFORNIA

27 IN RE: SOCIAL MEDIA ADOLESCENT  
28 ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION,

Case No. 4:22-MD-03047-YGR

MDL No. 3047

29 **DECLARATION OF LAURA M. LOPEZ  
30 IN SUPPORT OF OMNIBUS SEALING  
31 STIPULATION (MARCH 3, 2025 ORDER  
32 RESOLVING PRIVILEGE  
33 DETERMINATION AS TO FOURTEEN  
34 SNAP DOCUMENTS)**

35 THIS DOCUMENT RELATES TO ALL  
36 ACTIONS

37 Judge: Honorable Yvonne Gonzalez Rogers  
38 Magistrate Judge: Hon. Peter H. Kang

1                   **DECLARATION OF LAURA M. LOPEZ**

2                   I, Laura M. Lopez, declare and state as follows:

3                   1.         I am an attorney with the law firm Munger, Tolles and Olson and represent Snap  
4 Inc. (“Snap”) in the above-captioned case. This declaration is based on my personal knowledge. If  
5 called upon to do so, I could and would competently testify as follows.

6                   2.         The five exhibits referenced in the following chart are true and correct copies of the  
7 documents bearing the Bates numbers reflected in the chart. Redacted versions of these exhibits,  
8 along with other exhibits not at issue here, were previously filed under seal and unredacted  
9 versions were lodged with the Court for in camera review in connection with the Parties’ January  
10 14, 2025 Joint Letter Brief Regarding Snap’s Assertion of Privilege in Connection with 14  
11 Redacted Documents (ECF No. 1547). The Court granted the Parties’ Omnibus Stipulation to Seal  
12 those exhibits in their entirety (ECF Nos. 1550, 1635, 1660).

13                  3.         In connection with the Court’s March 3, 2025 Order Resolving Privilege  
14 Determination As To Fourteen Snap Documents (“March 3, 2025 Order”) (ECF No. 1732), the  
15 Court attached the five exhibits at issue with corrected redactions for attorney-client and work-  
16 product privilege.

17                  4.         Pursuant to the Court’s March 3, 2025 Order, Snap produced to Plaintiffs the five  
18 exhibits at issue bearing the redactions as indicated by the Court.

19                  5.         I have reviewed the documents Snap seeks to seal pursuant to the Court’s Order  
20 Setting Sealing Procedures (ECF No. 341). Based on my review of the March 3, 2025 Order and  
21 the five exhibits at issue in consultation with Snap, I understand there is good cause to seal the  
22 following information:

23 <b>Document</b>	Basis for Sealing
24                  Snap’s Exhibit B 25                  Bates: SNAP6913291 26                  ECF No. 1732-1	This exhibit contains sensitive and confidential information about Snap’s internal ad review practices, advertising and business strategies, relationships with advertising partners, lens product development, and public relations strategies. Disclosure of this information would provide competitors with insight into Snap’s business that they would not otherwise have and thereby cause competitive harm to Snap.

<b>Document</b>	<b>Basis for Sealing</b>
Snap's Exhibit D Bates: SNAP6928318 ECF No. 1732-2	This exhibit contains sensitive and confidential information about Snap's internal moderation practices and business strategies. Disclosure of this information would provide competitors with insight into Snap's business that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit F Bates: SNAP6955026 ECF No. 1723-3	This exhibit contains sensitive and confidential information about Snap's internal policy enforcement mechanisms, account investigation practices, and cooperation with law enforcement investigations. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit G Bates: SNAP6960749 ECF No. 1732-4	This exhibit contains sensitive and confidential information about Snap's internal investigation practices and cooperation with law enforcement investigations. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit H Bates: SNAP6969803 ECF No. 1732-5	This exhibit contains sensitive and confidential information about Snap's internal investigation practices, cooperation with law enforcement investigations, and media and communications strategies. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on March 28, 2025.

By: /s/ Laura M. Lopez  
LAURA M. LOPEZ